

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re : Chapter 11
FTX TRADING LTD., *et al.*¹, : Case No. 22-11068 (KBO)
Debtors. : (Jointly Administered)
: :
FTX RECOVERY TRUST, :
Plaintiff, :
-against- : Adv. Pro. No. 24-50186 (KBO)
RYAN SALAME, : Related to Adv. D.I. 2, 3, 58, 64, 71, 118
Defendant. :
:

MICHELLE BOND declares the following under penalty of perjury:

1. I am married to Ryan Salame. We started dating in October 2021. At the time I was separated and undergoing a divorce. Ryan and I moved in together in early 2022. Since that time, we have maintained a joint household and joint finances. Ryan and I have one son together and I have two children from my previous marriage. We married on September 28, 2024.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases (collectively, the “Debtors”), a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>

2. From September 2020 to December 23, 2022, I worked as the CEO for the Association of Digital Assets Markets (“ADAM”). During my tenure at ADAM, I also did additional consulting work as was permitted by my contract with ADAM.

3. My income from my work with ADAM and my consulting work contributed to my and Ryan’s joint finances starting from early 2022.

4. I began my career as a regulatory analyst at the Financial Industry Regulatory Authority (“FINRA”). I worked full time while in law school at the Columbus School of Law at The Catholic University of America. I maintain an active law license.

5. In 2011, I took a position as counsel for Senator Richard Shelby (R-AL) on the Senate Committee on Banking, Housing, and Urban Affairs. My next position was at the Securities and Exchange Commission, as Senior Counsel at the Office of International Affairs

6. In 2014, I reentered private practice, taking a job as the head of Global Regulatory Affairs for Bloomberg L.P.’s Government Affairs Office. I was responsible for all governmental and regulatory policy matters for Bloomberg’s vast financial services and terminal business.

7. In 2018, I transitioned to Global Head of Policy for two leading companies in the emerging digital asset market. In that role, I developed and implemented the company’s regulatory strategy for various digital assets. I spoke frequently on issues related to fintech, blockchain, digital assets, and related matters and became a prominent force in the cryptocurrency industry.

8. In September 2020, I took the position of CEO of ADAM: a private, non-profit, membership-based association of firms operating in the emerging cryptocurrency market. ADAM served the important function of developing the nascent crypto industry by setting

standards, promoting market integrity, developing industry codes of conduct, and advocating for rational and functional regulatory standards.

9. I met Sam Bankman-Fried in connection with my work in the crypto industry and we developed a professional friendship.

10. I frequently consulted for FTX on regulatory matters, helped Mr. Bankman-Fried prepare for congressional testimony, and provided other regulatory guidance. I also wrote speeches, attended conferences with FTX representatives on FTX's behalf, participated in high-profile meetings on behalf of FTX, connected FTX executives with domestic and international leaders, and helped secure speakers for FTX events.

11. I met Ryan in 2021. At the time I was separated from my husband and engaged in long and contentious divorce and custody proceedings.

12. By early 2022, Ryan and I were living together as a couple with combined household finances and were planning to marry as soon as my divorce was finalized.

13. On June 6, 2022, Ryan and I purchased a home at 9800 Avenel Farm Road in Potomac, Maryland. We took the property as Joint Tenants with Right of Survivorship. Attached as Exhibit A is a copy of the Deed executed on June 6, 2022.

14. In 2022, I entered the Republican Primary race for New York's First Congressional District seat in the United States House of Representatives.

15. Ryan's involvement and role in FTX is set out in detail in the Sentencing Submission he submitted to the court in connection with his criminal case, *United States v. Bankman-Fried, et al.*, No. 22-cr-673-LAK (S.D.N.Y.). Ryan's sentencing submission is attached here as Exhibit B.

16. Attached as Exhibit C is an excerpt from the October 11, 2023, testimony of Caroline Ellison at the trial of Sam Bankman-Fried, *United States v. Bankman-Fried*, No. 22-cr-673-LAK (S.D.N.Y.).

17. Attached as Exhibit D is a copy of the Information charging Ryan in his criminal case, *United States v. Bankman-Fried, et al.*, No. 22-cr-673-LAK (S.D.N.Y.) (D.I. 262).

18. I am aware that Ryan attempted to provide information to the government on more than one occasion. The government ultimately did not accept Ryan as a cooperator. I understand he was not accepted as a cooperator because he lacked sufficient information as to the inside workings of improper conduct at Alameda and FTX to be effective or useful to the government.

19. The government also opened an investigation into my congressional campaign to investigate whether I had violated campaign finance laws in the funding of my campaign.

20. Ryan and I were advised that, should Ryan plead guilty, the government would close its investigation into me. Ryan, anxious to protect me, our newborn son and my two other children, agreed to plead guilty.

21. Attached as Exhibit E is a copy of the Indictment filed against me in the matter *United States v. Bond*, 24-cr-00494-GBD.

22. Ryan satisfied his forfeiture obligation to the government with the payment of \$6 million and the forfeiture of certain property.

23. Ryan and I married on September 28, 2024, shortly after my divorce was finalized. Our son, my third child, was born nearly a year prior on November 21, 2023.

24. Ryan was assigned to FCI Cumberland to serve his sentence. Ryan reported to Cumberland on October 11, 2024, to begin serving his sentence.

25. After the filing of this adversary proceeding, Ryan engaged Montgomery McCracken Walker & Rhoads LLP (“MMWR”) to represent him.

26. Attached as Exhibit F is a copy of the listing on Zillow.com for my home at 9800 Avenel Farm Drive, Potomac, Maryland.

27. Attached as Exhibit G is a copy of the Deed for the property at 9800 Avenel Farm Drive, Potomac, Maryland, dated January 30, 2025.

28. I hold an interest in the crypto fund Multicoin Venture Fund III-A US, LP (the “Multicoin Investment”). Eighty-seven percent of this investment came from my own funds. I invested \$167,000 into this fund; Ryan invested just \$15,000. The investment is currently worth just over \$300,000 per the last investor statement.

29. Since MMWR failed to file a substantive opposition to the PI Motion (as defined in the accompanying brief), I have been attempting to find replacement counsel. I have identified and spoken with at least five potential attorneys, all of whom have conflicts. I am still attempting to find qualified counsel.

Dated: March 26, 2025

/s/ Michelle Bond
Michelle Bond